

APPENDIX C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNIÓN FENOSA GAS, S.A.,

Plaintiff,

- and -

ARAB REPUBLIC OF EGYPT; THE BANK OF
NEW YORK MELLON CORPORATION; AND
THE BANK OF NEW YORK MELLON SA/NV,
LUXEMBOURG BRANCH,

Defendants.

20 CV 9160

Civ. No. 20-_____

[PROPOSED] ORDER

[PROPOSED] ORDER ALLOWING PLAINTIFF TO FILE UNDER SEAL

The Court has considered Plaintiff Unión Fenosa Gas, S.A.'s ("UFG") motion requesting permission:

- Papered of 72
- (i) to file its Complaint and the exhibits thereto under seal, subject to review by Judge P. Kevin Castel (or any other judge assigned to this action) after Judge _____ Castel's determination of UFG's motion for relief from a Stipulation and Order for the Production and Exchange of Confidential Information ("Protective Order") in related proceedings brought by Plaintiff under 28 U.S.C. § 1782 (the "§ 1782 Proceedings"); and
- (ii) to file a redacted version of its Complaint, together with all other case-initiating documents (except the exhibits to the Complaint), on the public docket.

The Court finds that Plaintiff's motion should be granted.

IT IS HEREBY ORDERED that Plaintiff be allowed: (i) to file its Complaint and the

exhibits thereto under seal, subject to review by the judge assigned to this action after Judge

*Just to be clear: you can file under seal. The
seal will expire in 72 hours. Between now and then
you can file your complaint & exhibit the seal or not. As
planned you will serve them & attach the seal or not.*

Castel's determination of UFG's motion for relief from the Protective Order in the § 1782 Proceedings; and (ii) to file a redacted version of its Complaint, together with all other case-initiating documents (except the exhibits to the Complaint), on the public docket.

Dated: New York, New York

November 2, 2020



United States District Judge (Part I)